

Hearing Date: June 6, 2018 at 9:30 a.m. (Atlantic Standard Time)

Objection Deadline: April 9, 2018 at 4:00 p.m. (Atlantic Standard Time)

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF No. 1063, 1150, 1715

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY (“HTA”)

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

**SUMMARY OF SECOND INTERIM APPLICATION OF THE LAW OFFICES OF
ANDRES W. LOPEZ, PSC FOR ALLOWANCE OF COMPENSATION FOR SERVICES
 RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE
 PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR
 THE PERIOD FROM OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017**

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Name of Applicant: The Law Offices of Andrés W. López, P.S.C.
(“AWLLAW”)

Authorized to Provide Professional Services to: Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) as the entity authorized to act on behalf of the Commonwealth of Puerto Rico

Period for which compensation and reimbursement are sought: October 1, 2017 through December 31, 2017

Amount of Compensation sought as actual, reasonable, and necessary: \$11,480.00

Amount of Expense Reimbursement sought as actual, reasonable, and necessary: \$0.00

This is a(n): monthly X interim final application

- Blended Rate in this application for attorneys: \$350/hr
- Blended Rate in this application for all timekeepers: \$350/hr

Prior Monthly Fee Statements Filed:

Compensation Period	Fees Requested	Expenses Requested
May 3, 2017 – November 30, 2017	\$30,485.00	\$0.00
December 1 – December 31, 2017	\$5,075.00	\$0.00

- Both payments have been partially made, for 90% of the total amount.

TABLE OF SCHEDULES AND EXHIBITS

- Schedule A - List and Summary of Hours by Professional
- Schedule B - Summary of Hours and Compensation by Matter Code
- Schedule C - Expense Summary
- Schedule D - Customary and Comparable Disclosures
- Exhibit A - Attorney Certification
- Exhibit B - Detailed Time and Expense Records

Schedule A

LIST AND SUMMARY OF HOURS AND COMPENSATION BY PROFESSIONAL

Name	Title or Position	Hours Billed in this Application	Hourly Rate Billed in this Application	Total Compensation
Andrés W. López	Partner	32.80	\$350.00	\$11,480.00
TOTAL		32.80		\$11,480.00

Schedule B

SUMMARY OF HOURS AND COMPENSATION BY MATTER CODE

Task Code	Matter Description	Total Billed Hours	Total Fees Requested
<i>Commonwealth Title III Case</i>			
Litigation	This category includes analysis, preparation, and prosecution of adversary proceedings or other litigation.	7.00	\$2,450.00
Relief From Stay and Adequate Protection	This category includes all matters relating to creditor requests for relief from the automatic stay or for adequate protection, including assisting the Commonwealth respond, defend, and settle such requests.	17.70	\$6,195.00
Vendor and Other Creditor Issues	This category includes all meetings and communications with vendors and other trade creditors and utility providers.	8.10	\$2,835.00
Total		32.80	\$11,480.00

Schedule C

EXPENSE SUMMARY

Category	Amount
<i>No expenses are requested with this application.</i>	\$0.00
TOTAL	\$0.00

Schedule D

CUSTOMARY AND COMPARABLE DISCLOSURES

Category of Timekeeper	Blended Hourly Rate	
	Billed for FY2017	Billed This Case During the Compensation Period
Partner	N/A	\$350

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Title III

No. 17 BK 3567-LTS

**SECOND INTERIM APPLICATION OF THE LAW OFFICES OF ANDRES W. LOPEZ,
P.S.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO THE PUERTO RICO
FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY FOR THE PERIOD
FROM OCTOBER 1, 2017 THROUGH DECEMBER 31, 2017**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Law Offices of Andrés W. López, P.S.C. (“AWLLAW”), as counsel to the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) as the entity authorized to act on behalf of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Corporation, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Electric Power Authority (collectively, the “Debtors”), and certain other public corporations and instrumentalities of the Government of Puerto Rico, pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority, Act 2-2017*, makes its second interim application (this “Application”) for allowance of compensation, under sections 316 and 317 of PROMESA, of \$11,480.00 for the period from October 1, 2017 through December 31, 2017 (the “Compensation Period”) in accordance with the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, dated November 8, 2017 [ECF No. 1715] (the “Interim Compensation Order”) and the *Memorandum regarding Fee Review – Timeline and Process*, dated November 10, 2017 (the “Fee Examiner Guidelines”). In support of this Application, AWLLAW respectfully states as follows:

BACKGROUND

1. On May 3, 2017, the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 315(b) of PROMESA, filed a petition with the Court under title III of PROMESA.
2. On May 5, 2017, the Puerto Rico Sales Tax Financing Corporation (“COFINA”), by and through the Oversight Board, as COFINA’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

3. On May 21, 2017, the Puerto Rico Highways and Transportation Authority (“HTA”), by and through the Oversight Board, as HTA’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

4. On May 21, 2017, the Employees Retirement System for the Commonwealth of Puerto Rico (“ERS”), by and through the Oversight Board, as ERS’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

5. On July 3, 2017, the Puerto Rico Electric Power Authority (“PREPA”), by and through the Oversight Board, as PREPA’s representative pursuant to PROMESA section 315(b), filed a petition with the Court under title III of PROMESA.

6. Through Orders of this Court, the Commonwealth, COFINA, HTA, ERS, and PREPA Title III Cases (together, the “Title III Cases”) are jointly administered for procedural purposes only, pursuant to PROMESA section 304(g) and Bankruptcy Rule 1015 [ECF Nos. 242, 537, 1417].

7. This application seeks allowance of compensation and reimbursement of expenses incurred by AWLLAW solely in connection with the COFINA related matters described below.

COMPENSATION REQUESTED

8. AAFAF has retained AWLLAW pursuant to an engagement letter dated July 31, 2017 (the “Engagement Letter”). Pursuant to the Engagement Letter, payment of all fees and expenses detailed in this Application will be made exclusively by AAFAF.

9. AWLLAW’s hourly rates are set at a level designed to compensate AWLLAW fairly for the work of its attorneys and are disclosed in detail in the Engagement Letter.

10. AWLLAW’s rates are appropriate for complex corporate, securities, litigation, and restructuring matters, whether in court or otherwise. The rates and rate structure reflect that such

complex matters typically involve great complexity, high stakes, and intense time pressures. Further, there have not been any rate increases during the Compensation Period. AWLLAW submits that the compensation requested is reasonable in light of the nature, extent, and value of such services provided to AAFAF.

11. During the Compensation Period, AWLLAW did not receive any payments or promises of payment from any other source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between AWLLAW and any other person for sharing of compensation to be received for services rendered in these cases.

SUMMARY OF SERVICES

12. During the Interim Period, AWLLAW provided important professional services to the Debtors in connection with the Title III Cases. Detailed descriptions of the specific services provided and the time expended performing such services are attached as **Exhibit B**, and a summary of the services AWLLAW provided to the Debtors during the Compensation Period is set forth below.

13. In its fee applications, AWLLAW will use the subject matter categories (each, a “Matter Category”) used by its co-counsel law firm, O’Melveny & Myers LLP (“OMM”), for keeping time records of the work performed for the Debtors. The following is a summary, by Matter Category, of the professional services provided by AWLLAW during the Compensation Period.

a) Litigation – 7.00 hours – \$2,450.00

14. This category includes analysis, preparation, and prosecution of adversary proceedings or other litigation. During the Compensation Period, AWLLAW worked with

OMM on various litigation matters and on motions filed pursuant to Rule 2004 seeking to conduct discovery of various issues relating to Puerto Rico's fiscal matters.

b) Relief from Stay and Adequate Protection – 17.70 hours – \$6,195.00

15. This category includes all matters relating to requests for relief from the automatic stay or for adequate protection, including assisting the Commonwealth to respond, defend, and settle such requests. During the Compensation Period, AWLLAW worked with OMM in analyzing and responding to requests to lift the Title III stay (either by motion or lift stay notice), and in implementing a lift stay protocol to streamline the process for seeking relief from the Title III stay.

c) Vendors and Other Creditor Issues – 8.10 hours -- \$2,835.00

16. This category includes all meetings and communications with vendors and other trade creditors and utility providers. During the Compensation Period, AWLLAW worked with OMM in helping to analyze issues and payment disputes with various government vendors, and to resolve the issues and disputes as appropriate.

ATTORNEY CERTIFICATION

14. In accordance with Puerto Rico Local Bankruptcy Rule 2016-1(a)(4), the undersigned has reviewed the requirements of Puerto Rico Local Bankruptcy Rule 2016-1(a)(4) and certifies to the best of his information, knowledge, and belief that this Application complies with Puerto Rico Local Bankruptcy Rule 2016-1(a)(4). In this regard, and incorporated herein by reference, the *Certification of Andrés W. López* in accordance with the U.S. Trustee Guidelines is attached hereto as **Exhibit A**.

NO PRIOR APPLICATION

15. No prior application for the relief requested by this Application has been made to this or any other court.

WHEREFORE, AWLLAW respectfully requests that the Court enter an order: (a) awarding AWLLAW compensation for professional services provided during the Compensation Period in the amount of \$11,480.00; and (b) granting such other relief as is appropriate under the circumstances.

Dated: March 20, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/Andrés W. López
Andrés W. López
USDC No. 215311
**THE LAW OFFICES OF
ANDRÉS W. LÓPEZ, P.S.C.**
902 Fernández Juncos Ave.
San Juan, PR 00907
Tel: (787) 294-9508
Fax: (787) 294-9519

*Attorneys for the Puerto Rico Fiscal Agency
and Financial Advisory Authority*

Exhibit A

ATTORNEY CERTIFICATION

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
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PROMESA

Title III

No. 17 BK 3567-LTS

**CERTIFICATION OF ANDRES W. LOPEZ PURSUANT TO PUERTO RICO LOCAL
BANKRUPTCY RULE 2016-1(a)(4)**

² The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Andrés W. López, under penalty of perjury, certifies as follows:

1. I am a partner with the law firm of The Law Offices of Andres W. López, P.S.C. (“AWLLAW”). I make this certification in accordance with Rule 2016-1(a)(4) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”) regarding the contents of applications for compensation and expenses.
2. I am familiar with the work performed by AWLLAW for the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), acting for or on behalf of the Debtors.
3. I have read the *Second Interim Application of The Law Offices of Andrés W. López, P.S.C. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses As Counsel to the Debtors for the Period From October 1, 2017 through December 31, 2017* (the “Application”), and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.
4. To the best of my knowledge, information, and belief, formed after reasonable inquiry, the fees and disbursements sought in the Application are permissible under PROMESA, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Interim Compensation Order, the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013* (the “Guidelines”), and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Puerto Rico.

Dated: March 19, 2018

/s/Andrés W. López
Andrés W. López

Exhibit B

DETAILED TIME AND EXPENSE RECORDS

I. **Litigation**

<u>Date</u>	<u>Services</u>	<u>Hours</u>
10/2/17	Correspond w/J. Spina re motion to adjourn October 4, 2017 hearing in <i>Assured</i> ; review draft motion re same.	0.40
10/3/17	Correspond w/A. Pavel re informative motion regarding attendance at October 11, 2017 in <i>Assured</i> ; review draft motion re same.	0.40
10/6/17	Review memos from P. Friedman, Proskauer team re proposed extension of time in <i>Ambac</i> and <i>Assured</i> matters.	0.20
10/30/17	Telephone conference w/H. Bauer HTA motion to compel and Siemens Rule 2004 motion (0.2); conference call w/GDB team re same (0.3); correspond w/I. Garau re same (0.3).	0.80
10/30/17	Correspond w/A. Pavel re reply brief on motion to dismiss in <i>Ambac</i> ; review draft reply re same.	0.40
10/30/17	Correspond w/I. Garau re draft stipulation follow up on meeting with opposing counsel re pending motion to assume or reject executory contracts.	0.30
10/31/17	Correspond w/G. Lopez, I. Garau re revised opposition to Siemens Rule 2004 motion; review revised opposition re same.	0.50
10/31/17	Correspond w/A. Pavel re revised supplemental reply brief and joinder in <i>Ambac</i> ; review draft re same.	0.40
11/8/17	Review memos from O. Ramos, M. Trelles (GDB's counsel) re informative motion re appearance at November 15, 2017 on Siemens Rule 2004 motion; review draft motion re same.	0.40
11/16/17	Correspond w/A. Pavel re upcoming motions to be filed in <i>Ambac</i> and <i>Assured</i> matters in advance of November 21, 2017 hearing (0.3); review informative motions re same (0.2);	0.70

review memo from W. Burgos and revise motions re same (0.2).

11/17/17	Review Court Order granting in part and denying in part Siemens' Rule 2004 motion.	0.10
11/27/17	Review memo from P. Friedman re draft supplemental briefs in <i>Assured</i> ; review draft briefs re same.	0.50
12/8/17	Correspond w/P. Friedman re admission in First Circuit and information re same.	0.20
12/11/17	Correspond w/G. Hoplamazian re: entry of appearance in <i>Peaje</i> First Circuit appeal; enter appearance in <i>Peaje</i> .	0.50
12/13/17	Review memo from J. Cardona re proposed draft stipulation re motion to compel assumption or rejection of executory contracts; review draft stipulation re same.	0.50
12/21/17	Memos to and from P. Friedman re filing an appearance in Peaje matters in the First Circuit (0.2); prepare and file entries of appearance re same (0.5).	0.70
Total Hours:		7.00
Total Fees:		\$2,450.00

II. Relief From Stay and Adequate Protection

10/16/17	Review memo from J. Morales-Cordero (counsel to HTA managerial employees) re further enlargement of time to consider and potentially negotiate pending cases; review draft motion re same; correspond with D. Perez re same.	0.50
10/19/17	Review memo from J. Morales-Cordero (counsel to HTA managerial employees) re revised motion to enlarge time to consider pending cases; correspond w/D. Perez re same; review revised motion re same.	0.50
10/21/17	Correspond w/J. Spina, J. Morales-Cordero (counsel to HTA managerial employees) re revised draft of stipulation extending deadlines (0.4); review draft stipulation re same (0.3).	0.70

10/23/17	Correspond w/D. Perez re lift stay notice re Vega Baja and HTA; review background documents re same.	0.50
10/24/17	Correspond w/J. Morales-Cordero (counsel to HTA managerial employees) re revised draft of stipulation extending deadlines.	0.30
10/24/17	Memo to J. Maldonado re lift stay notice re Vega Baja and HTA.	0.20
11/1/17	Review memo from D. Perez re conference w/opposing counsel re Rexach Hermanos case and their motion to lift stay, and potential stipulation re same; review attached reply re same.	0.40
11/2/17	Review memos re Siemens matter joint status report (0.2); conference call with counsel re same (0.3); review draft joint status report (0.2); review memos from G. Lopez, C. Forbes, H. Bauer, M. Trelles re same (0.4).	1.10
11/13/17	Review memo from D. Perez re revised stipulation in Rexach Hermanos lift stay notice matter; review revised stipulation re same; review memo from I. Garau re same.	0.50
11/14/17	Review Rexach Hermanos' motion to withdraw their previously-filed motion to lift stay.	0.10
11/18/17	Review new lift stay notice (R. Dieppa, counsel); correspond with D. Perez, C. Juan, J. Maldonado re same.	0.40
11/27/17	Review memo from R. Dieppa (counsel to Mendez-Colon) re lift stay notice; correspond w/R. Dieppa re same.	0.20
11/28/17	Memo to J. Maldonado re Mendez-Colon lift stay notice.	0.10
12/1/17	Correspond w/J. Morales-Cordero (counsel to HTA managerial employees) re tables describing all pending cases and procedural posture of each case (0.2); review table re same (1.0).	1.20
12/4/17	Correspond w/D. Perez re status of HTA lift stay notices and conversation w/J. Maldonado re same; correspond w/ J. Maldonado re same.	0.50

12/12/17	Review lift stay notice from R. Garcia-Fontan; review memo from H. Bauer re same.	0.40
12/13/17	Review memo from D. Perez and accompanying documents re outstanding HTA lift stay matters for discussion and resolution.	2.00
12/14/17	Review memo from R. Miranda (counsel to FDR 1500 Corp.) re lift stay notice; review attached document re same.	0.50
12/15/17	Telephone conference w/I. Garau re lift stay notices and conference w/Juan Maldonado re same.	0.30
12/15/17	Review memo from D. Perez re Castro Business lift stay notice and scheduling conference call to discuss pending matters; review lift stay notice re same.	0.40
12/15/17	Memo to and from D. Perez re procedure for handling lift stay notices related to HTA.	0.30
12/17/17	Review memos re conference w/J. Maldonado to discuss pending lift stay notices; memo to J. Maldonado re same.	0.40
12/19/17	Review memo from M. Vicens re lift stay notice (Finca Matilde); review attached supporting document re same.	0.30
12/19/17	Memos to and from J. Maldonado re conference call to discuss pending HTA-related lift stay notice matters.	0.20
12/20/17	Memos to and from D. Perez re telephone conference w/J. Maldonado to cover HTA-related lift stay notice matters.	0.20
12/20/17	Review memo from attorney M. Vicens re Finca Matilde lift stay notice matter; review supporting documentation re same; memo to D. Perez, J. Maldonado re same.	0.50
12/20/17	Memos to and from D. Perez re timing and outreach to opposing counsel in Jimenez lift stay notice matter (0.2); review background documents re same (0.5).	0.70
12/21/17	Memos to and from D. Perez re Jimenez lift stay notice matter (0.2); telephone conferences w/counsel for Jimenez (0.4); memos to and from D. Perez re same (0.2); review memo from D. Perez w/draft motion to extend HTA's deadline to respond to motion requesting payment of	1.50

pre-petition claims (0.3); review memo from I. Garau re same (0.1); review draft motion re same (0.2); memo to D. Perez re same (0.1).

12/21/17	Memos to and from J. Maldonado re telephone conference to discuss pending HTA-related lift stay notice matters.	0.20
12/22/17	Memos to and from D. Perez re reaching out to plaintiffs' counsel in Jimenez lift stay notice matter (0.2); review draft motion to extend time (0.2); memos to and from J. Soto (plaintiff's counsel) re draft motion to extend time to file response to motion requesting payment of pre-petition claims (0.2).	0.60
12/27/17	Conference w/attorney Y. Mafuz-Blanco re lift stay notice matter (1.0); review documents related to lift stay notice (0.7); memo to D. Perez re same (0.2).	1.90
12/28/17	Review memo from J. Maldonado re attorney Y. Mafuz-Blanco's lift stay notice.	0.10

Total Hours: **17.70**

Total Fees: **\$6,195.00**

III. Vendor and Other Creditor Issues

10/10/17	Correspond w/J. Maldonado, R. Castellanos, H. Bauer, D. Perez re meeting with opposing counsel re motion to compel assumption or rejection of executory contracts.	0.40
10/12/17	Review documents re motion to compel assumption or rejection of executory contracts (2.5); conference w/H. Bauer, J. Maldonado, R. Castellanos, and opposing counsel re same (1.7); correspond w/D. Perez re same (0.2).	4.40
10/24/17	Review memo from H. Bauer re draft stipulation following up on meeting with opposing counsel re pending motion to assume or reject executory contracts; review draft re same.	0.50
10/25/17	Correspond w/ J. Spina re draft stipulation following up on meeting with opposing counsel re pending	0.50

motion to assume or reject executory contracts;
correspond w/D. Perez re same; memo to J. Maldonado
re same.

11/1/17	Correspond w/J. Spina, D. Perez, J. Maldonado re draft stipulation following up on meeting with opposing counsel re pending motion to assume or reject executory contracts.	0.50
11/2/17	Review memos from J. Spina, D. Perez re draft stipulation following up on meeting with opposing counsel re pending motion to assume or reject executory contracts.	0.50
11/6/17	Review memos to and from D. Perez, J. Maldonado re stipulation to resolve pending motions seeking to compel assumption or rejection of executory contracts (Tamrio, Constructora Santiago, Ferrovial Agroman); review documents re same.	0.40
11/8/17	Review memo from H. Bauer re agreement with opposing counsel (J. Cardona) to adjourn hearing on pending motions to compel until December omnibus hearing and reply memo from J. Cardona agreeing re same; review draft stipulation to potentially moot the pending motions to compel.	0.50
12/8/17	Correspond w/D. Perez re recently-filed motion requesting payment of funds; review motion; memo to J. Maldonado re same.	0.40

Total Hours: **8.10**

Total Fees: **\$2,835.00**

For Professional Services rendered:

	<u>Hours</u>	<u>Amount</u>
Andrés W. López, Esq.	32.80	\$11,480.00